

IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI

IN RE:)	
)	
INTERSTATE UNDERGROUND WAREHOUSE)	
AND INDUSTRIAL PARK, INC.)	Case. No. 21-40834
)	Chapter 11
Debtor.)	

OBJECTION TO CLAIM

Comes now Movant Interstate Underground Warehouse and Industrial Park, Inc., and hereby objects to the Proof of Claim filed by creditor, IPFS Corporation, in the amount of \$22,738.80, and filed on November 12, 2021. The court claim number is 19.

Your claim may be reduced, modified, or eliminated. You should read this document carefully and discuss it with your attorney, if you have one.

Pursuant to Local Rule 3007-1 (C), the Claimant shall have 30 days after service of the Objection in which to file a Response, if you do not want the court to eliminate or change your claim. The Response shall be in writing and state why the claim should be allowed as filed. If a Response is filed, the Court will schedule a hearing. If no timely Response is filed, the Court will enter an Order sustaining the Objection to the Claim. Parties not represented by an attorney shall mail a Response to the Court at **U.S. Bankruptcy Court, 400 E. 9th St., Room 1510, Kansas City, MO 64106**. Debtor(s) not represented by an attorney must be served a copy of the Response by regular mail. If your Response is mailed, it must be early enough so that the court will receive it on or before 30 days after service of the Objection.

The basis for the objection is as follows: (PLEASE CHECK ONLY THE APPLICABLE BOXES)

☒ The claim should be disallowed entirely because the Debtor has paid the premium of financed insurance policies which is claimed of \$22,738.80. The undersigned spoke with a representative of IPFS who confirmed that the debt was paid and promised to withdraw its claim, which has not yet been done.

Dated: 1/18/2022

KRIGEL & KRIGEL, P.C.

/s/ Erlene W. Krigel
Erlene W. Krigel, MO #29416
4520 Main St., Ste. 700
Kansas City, MO 64111
Telephone: (816) 756-5800
Fax: (816) 756-1999
Email: ekrigel@krigelandkrigel.com
ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I, Erlene Krigel, hereby certify that a true and correct copy of the Objection to Claim was mailed to IPFS Corporation by first class mail this 18th day of January 2022:

IPFS Corporation
Attn: Lisa R. Chandler
30 Montgomery St., Ste. 501
Jersey, City, NJ 07302

And to all parties in interest requesting notice through the ECF Noticing System.

Dated: January 18, 2022

/s/ Erlene W. Krigel
Erlene W. Krigel

Court address: U.S. Bankruptcy Court, 400 E. 9th St., Room 1510, Kansas City, MO 64106

Instructions: Complete all parts of the form and serve on the affected parties

ECF Event: Bankruptcy>Claim Actions>Objection to Claim (includes 30-day notice)